

After reading comments filed by several Commercial Broadband Over Power Line (BPL) proponents, this petitioner does not believe the claims made that suggest this technology poses no interference potential to licensed services. In particular, services which are most at risk to interference from BPL are licensed Maritime Mobile, Amateur, and even public safety communications below 50 MHz.

This petitioner also believes that comments made by Commercial Corporations in support of BPL suggesting that the "burden should be on opponents of this technology [BPL] to prove that it does pose an interference potential." Since BPL is an unlicensed service falling under the control of FCC Part 15 rules, the burden of proof of a lack of interference potential is thus placed on BPL proponents. Licensed services such as Maritime Mobile and Amateur Radio are just that: licensed. Unlicensed services thus should be given the burden to prove that they do not pose interference potential to licensed services.

I urge the FCC to follow Japan's lead: recognize that the interference potential from BPL systems is extremely high, too high to risk the rendering unusable of licensed services operating on the HF region of the spectrum.

Respectfully submitted.